Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of Section 304 of the Telecommunications Act of 1996	)	CS Docket No. 97-80
	)	
	)	
Commercial Availability of Navigation Devices	)	
	)	
	)	
Compatibility Between Cable Systems and Consumer Electronics Equipment	)	PP Docket No. 00-67

REPLY COMMENTS OF THE DIGITAL LIVING NETWORK ALLIANCE

The Digital Living Network Alliance ("DLNA") submits these reply comments to the Commission's Third Further Notice of Proposed Rule Making ("FNPRM").

DLNA supports high definition with numerous media formats. Today, there are already more than 51 DLNA certified televisions shipping in the market with HD support, including products from Hewlett Packard, JVC, Pioneer, Sony, and Toshiba. There are also literally hundreds of models of personal computers (PCs) that are DLNA certified media servers shipping in the US and other regions, most all of which are capable of serving HD content to DLNA certified HD capable TVs. A complete list of DLNA certified devices, including those listed here, can be found on the DLNA website at: http://product.dlna.org/eng/search_advanced.aspx. For more information regarding DLNA's technical support for high definition content, we refer the Commission to DLNA Volume 2: Media Format Profiles - An Industry Guide for Building Interoperable Platforms, Devices, and Applications.

Contrary to the assertions of some, Ethernet infrastructure is particularly well suited for handling HD content. Commodity Ethernet infrastructure products, now widely available to consumers, such as switches and routers are non-blocking in nature and are therefore fundamentally capable of handling multiple streams of HD content in such a manner that the multiple streams do not interfere with one another. Although all network platforms have limits (IEEE 1394 and Ethernet are not exception), Ethernet, has advantages. For example, using commodity, broadly available Ethernet products and DLNA certified products on the same home network, HD traffic remains in the cluster of devices that are sharing the HD content, enabling simultaneous and problem free viewing of HD streams in different rooms. Although multiple streams of HD content traveling between rooms could theoretically encounter issues depending on the specific circumstances and network configuration, this is not a general problem. In contrast, currently available products supporting the IEEE 1394 infrastructure direct all HD traffic to all IEEE 1394 products in the consumer's home. The result is that despite the differences in bandwidth resource utilization between IEEE 1394 and Ethernet, the IEEE 1394 network saturates before the Ethernet network, even when multiple HD streams are happening within separated clusters of consumer products. Specifically, HD streams traveling locally in an Ethernet home network remain local, whereas HD streams traveling in an IEEE 1394 network, whether locally or not, traverse the entire IEEE 1394 home network and thereby reduce the available bandwidth resource for all device communications. DLNA therefore believes that

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Ethernet offers a superior user experience in a consumer's typical environment and that it is therefore not only suitable for, but superior to IEEE 1394 in, addressing the application of HD video streaming in a home network.

Sincerely,

/Scott Smyers/

Scott Smyers
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Digital Living Network Alliance

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